

July 7, 2022

**Sent Via Email To:** [bbaker@norwalkct.org](mailto:bbaker@norwalkct.org) **and Regular Mail To:**

Bryan Baker  
Principal Planner  
City of Norwalk  
Department of Planning & Zoning  
125 East Avenue  
Norwalk, CT 06851

**Re: #2022-31R/SP/CAM – BPC Capital Management I, LLC  
3 Park Street, Norwalk, CT**

Dear Mr. Baker:

As you are aware, this firm represents BPC Capital Management I, LLC, owner of real property with the improvements thereon located at 3 Park Street in Norwalk, CT (District 1, Block 60, Lot 7). We are in receipt of your July 1, 2022 memorandum and provide the following information and initial responses to staff comments:

1. *As part of the historic preservation development requirements, a narrative prepared by a Historic Architect is required to be submitted which details the proposed work to be done to the exterior of the historic structure. The Historic Architect must submit their resume for review to confirm that they are qualified for historic architecture as listed under 36 CFR Part 61 of the Secretary of the Interior's Qualification Standards. As of the writing of this memo, such a narrative has not been submitted to our office.*

**Response:** An analysis of the architecture of the Stiles Curtis House and of its namesake, was prepared by Tod Bryant, MA, principal of Heritage Resources. It was referenced in the special permit narrative, copies were submitted with the application, and the report was resent via email on July 5, 2022.

2. *As part of the historic preservation development requirements, this application must be referred from the Planning & Zoning Commission to the Historical Commission for their review and recommendation. If the Historical Commission does not make a recommendation in favor of the project, a 2/3 majority vote of the Planning & Zoning Commission is required to approve the special permit application.*

**Response:** No action required by the Applicant at this time.

3. *A village district review is required to be done by a Village District Consultant. The report of the consult shall be entered not the public hearing record and considered by the Commission in making its decision.*

**Response:** No action required by the Applicant at this time; however, the Applicant does request that the Village District Consultant ("VDC") contact the Applicant and its architect with questions and/or suggestions prior to the issuance of its report to the Commission so that it may respond and revise the plans accordingly prior to submission of the report to and action by the Commission.



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4. *The text amendment application has been referred to the Harbor Commission as well as the Connecticut Department of Energy and Environmental Protection (DEEP) for their recommendation on consistency with the Harbor Management Plan and the Coast Management Act. The coastal site plan review application was also referred to DEEP for their recommendation and on consistency with the Coastal Management Act.*

**Response:** The Harbor Management Commission has scheduled review of the text amendment at its July 27, 2022 meeting. No further action is required by the Applicant regarding these referrals.

5. *Information regarding compliance with the Workforce Housing regulations has not been provided as of the writing of this memo. Per Sec. 118-1050D.(2)a., b and c of the Norwalk Building Zone Regulations, for developments of 10 dwelling units or more, a minimum of 10% of the total number of units are required to be workforce units.*

- a. *In addition to the above, should the application ultimately be approved, a workforce housing plan shall be required that shows the total number of workforce units, deed restriction documents and architectural floor plans to be filed on the Norwalk Land Records that demonstrate that the workforce units be deed restricted in perpetuity.*

**Response:** The Applicant will submit a draft workforce housing plan and draft deed restriction. In all likelihood, the total number of units will be reduced to ten (10), with one (1) unit identified as a workforce housing unit.

Additional comments:

1. *More details regarding the landscape plan should be submitted*

- a. *There are three large trees located between the sidewalk and the street, the landscaping plan should clarify that those trees are remaining as part of this application.*

**Response:** The trees are intended to remain, and the plan will be revised accordingly. These trees are located on City of Norwalk property, and not on the 3 Park Street parcel owned by the Applicant.

- b. *The landscaping plan should detail which trees that exist today are proposed to be removed. It appears that the existing landscaping between 3 Park Street and 2 Park Street (the property to the south) will be removed as part of this application.*

**Response:** The Applicant is also the owner of 2 Park Street. Most of the existing landscaping will be removed but the Applicant intends to create a welcoming and congruent landscaped environment between the buildings.

- c. *The property located directly behind 3 Park Street is a funeral home and therefore should be provided with additional privacy for sensitivity of that use. Therefore, staff recommends that the landscaping along the rear property line be substantially increased with plantings that would provide adequate visual and sound screening.*

**Response:** It should be noted that the owner of 5 East Wall Street has submitted a letter of support for the project as currently configured. He does not want any additional landscaping on the Applicant's property beyond that which has been identified in the plan which has been discussed with and agreed to by him. Further, he does not support any other visual barrier such as a fence or wall.



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2. *Revisions to the site plan*

- a. *The existing site plan shows the overhead wires that exist today are proposed to remain. Staff recommends that these wires be buried underground which would add to the visual appearance of the area as well as hazard mitigation during storms. Similarly, as part of the 3 East Wall Street project, the overhead wires were buried underground.*

**Response:** The plans will be revised to depict that the overhead utility wires will be buried.

- b. *The existing site plan also shows that the existing asphalt sidewalk is to remain. Staff recommends that the sidewalk be replaced to meet current City of Norwalk standards and any other recommendations/requirements provided by DPW and TMP. In keeping with this, the existing walkway from the sidewalk to the front entrance of the historic building is also asphalt, staff recommends that the asphalt be replaced with more architecturally appealing material such as brick, stone or stamped concrete.*

**Response:** The City of Norwalk Department of Public Works just recently installed the asphalt sidewalk with great care. Its configuration, location, and material were all considered in response to the existing trees so that their root systems would be minimally damaged so to avoid death of the trees. Accordingly, the Applicant would prefer that the recently installed sidewalk remain unchanged. However, the Applicant will consider the staff request regarding the walkway from the sidewalk to the entrance of the Stiles Curtis House but will wait to revise plans until it has received Department of Public Works and Transportation, Mobility & Parking ("TMP") comments, which have not yet been provided, and those of the VDC.

- c. *At the rear of the property, it appears that there is excess backup space being provide for the parking spaces, ranging from 25' of backup space to 28' of backup space. Staff recommends that the parking spaces be moved close to the buildings a possible, lowering the backup space to the 24' minimum requirement which would allow the applicant to add more landscaping and buffer area along the rear property line. In doing so, this would reduce the overall amount of impervious surface on the lot which as proposed is currently at the 70% maximum allowed.*

**Response:** Some of the excess backup space has been proposed to allow for greater ease of movement around the existing and proposed buildings. However, the Applicant will consider this request, but will wait to revise plans until it receives comments from the VDC. As an aside, the proposed site plan depicts 18 parking spaces, not 17.

- d. *Details should be provided on whether the three stone patios that are located along the southern property line are pervious or not. If these patios are impervious, despite the Building Zone Regulations not necessarily counting patios toward coverage calculations, the property would likely exceed the 70% maximum threshold for coverage.*

**Response:** On-grade patios have consistently been excluded from coverage, but should coverage exceed the 70% maximum, the reductions to the length of back-up aisle dimensions suggested by staff should bring the property into full compliance. Should additional relief be required, that is available to the Applicant under Sec. 118-500, up to a maximum of 25% in relief.

- e. *The recreation area in the northwest corner of the lot, adjacent to the parking area is also shown to be the location of the dumpster. Staff recommends that the dumpster be moved to a different location on the site so as not to interfere with the recreation area.*



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**Response:** The dumpster will remain as noted on the plans since it is furthest from the residences, but that area will no longer be identified as recreation area. There is sufficient recreation area on the site to achieve zoning compliance.

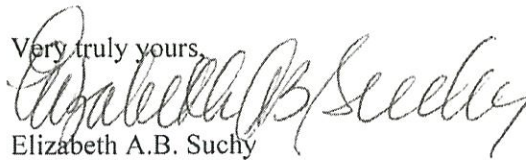
3. *Additional traffic information*

- a. *The traffic study that was submitted considers only the development located at 3 Park Street and not the overall traffic implications that the text amendment may have. Staff recommends that additional traffic information be provided that evaluates the traffic impacts that lowering the minimum lot size for historic preservation developments from 30,000sf to 20,000 sf may have on the area.*

**Response:** The Applicant will provide additional analysis once it receives comments from TMP.

Additional information and responses may be forthcoming. Should you have any further questions, please do not hesitate to contact me.

Very truly yours,



Elizabeth A.B. Suchy

EABS